

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division

ROBERT DAVID STEELE	)	
<u>et al</u>	)	
	)	
Plaintiffs,	)	
	)	
v.	)	<u>Case 3:17-cv-601-MHL</u>
	)	
	)	
JASON GOODMAN	)	
<u>et al</u>	)	
	)	
Defendants.	)	
	)	

## **STIPULATIONS OF UNCONTROVERTED FACTS**

Plaintiffs, Robert David Steele and Earth Intelligence Network (“Plaintiffs”), by counsel, and Defendant, Jason Goodman (“Goodman”), *pro se*, pursuant to Paragraphs 37 and 38 of the Court’s Initial Pretrial Order [ECF No. 157] and the Court’s Order entered on April 16, 2020 [ECF No. 191], jointly submit the following Written Stipulations of Uncontroverted Facts.

### **I. Stipulated Facts**

Plaintiffs and Goodman stipulate and agree that the following facts are established and proven for purposes of this action:

1. Robert David Steele (“Steele”) is 66 years-old.
2. Steele’s education, experience, and publications, awards and recognitions are catalogued on his websites, <http://robertdavidsteele.com/> and <https://phibetaiota.net/>.

3. Earth Intelligence Network (“EIN”) is a not-for-profit, 501(c)(3) Virginia corporation founded by Steele in 2006.

4. Goodman is the editor-in-chief of Crowdsource the Truth (“CSTT”).  
5. Goodman created a YouTube channel called “Jason Goodman”.  
6. Goodman created a YouTube channel called “Crowdsource The Truth 2”.  
7. Goodman created a YouTube channel called “21c3D”.  
8. Goodman created a page on Facebook called “Crowdsource The Truth”.  
9. Goodman created a Twitter account called “CrowdsourcetheTruth”,  
@csttheruth.

10. Goodman is responsible for the content published on the “Jason Goodman”, “Crowdsource The Truth 2” and “21c3D” YouTube channels.

11. Goodman is responsible for the content published on the Twitter account, @csthtruth.

12. On June 20, 2017, Goodman published a video on the “Jason Goodman” YouTube channel entitled, “COG”. To date, the video has received more than 13,890 views.

13. On June 26, 2017, Goodman published a video on YouTube entitled, “Queen Tut call re: Robert David Steele #Unrig Fraud Claim”.

14. “Queen Tut” is Susan Lutzke (“Lutzke”).  
15. On June 27, 2017, Goodman published a video on the “Jason Goodman” YouTube channel entitled, “FRANK BACON Call Regarding Robbing and Stealing #unrig”. To date, the video has received more than 10,605 views.

16. On June 29, 2017, Goodman published a video on the “Jason Goodman” YouTube channel entitled, “**Squidward v. Sponge Bob**”. To date, the video has received more than 11,450 views.

17. On August 7, 2017, Goodman published a video on the “Jason Goodman” YouTube channel entitled, “**Queen Tut 003**”. To date, the video has received more than 9,870 views.

18. On August 11, 2017, Goodman sent the following email to Dr. Cynthia McKinney (“Dr. McKinney”):

“From: Jason Goodman <[truth@crowdsourcethetruth.org](mailto:truth@crowdsourcethetruth.org)  
Subject: Your association with Robert David Steele

Dr. McKinney,

Both myself and George Webb have made several attempts to contact you, but have not received a direct response. I hold you in very high regard and I am slightly confounded by your decision to align with Robert David Steele. In my estimation he has repeatedly made ignorant and even racist comments, has defrauded my audience of money, has personally and publicly insulted me and is actively attempting to co-opt your credibility to raise funds. I would really appreciate it if you would agree to an interview via Skype to address these concerns. Many people in our audience have concerns about your association with RDS given his ongoing abusive behaviors documented in a number of videos. Thank you for your consideration, I await your response.”

19. On August 13, 2017, Goodman published a video on the “Jason Goodman” YouTube channel entitled, “**Queen Tut 005 - Damning Evidence of Fraud in the #Unrig Campaign**”. To date, the video has received more than 14,872 views.

20. On August 17, 2017, Goodman published a video on the “Jason Goodman” YouTube channel entitled, “**Parallels to Soros: Micro to Macro**”. To date, the video has received more than 11,045 views.

21. On August 26, 2017, Goodman published a video on the “Jason Goodman” YouTube channel entitled, “**Unrig Cynthia McKinney**”. To date, the video has received more than 12,575 views.

22. On August 30, 2017, Goodman published a video on the “Jason Goodman” YouTube channel entitled, “**Je Suis Queen Tut - Is Robert David Steele Running an Op Against George Webb & CSTT?**”. To date, the video has received more than 10,090 views.

23. On September 6, 2017, Goodman published a video on the “Jason Goodman” YouTube channel entitled, “**Crushing Grip of the Deep State**”. To date, the video has received more than 13,020 views.

24. On September 11, 2017, Goodman published a video on “Jason Goodman” YouTube channel entitled, “**#Unrig Espionage, Treason and Traitors in Congress**”. To date, the video has received more than 11,710 views.

25. On September 23, 2017, Goodman published a video on the “Jason Goodman” YouTube channel entitled, “**Unraveling the Deep State – Conspiracy to Suppress Free Speech**”. To date, the video has received more than 10,840 views.

26. On September 27, 2017, Goodman published a video on the “Jason Goodman” YouTube channel entitled, “**Fyreside Chat With What Big Eyes You Have**”. To date, the video has received more than 7,850 views.

27. On September 30, 2017, Goodman published a video on the “Jason Goodman” YouTube channel entitled, “**#fakelawsuit: The Impotent Psychological Warfare of The Robber David Who Steals**”. To date, the video has received more than 7,850 views.

28. On October 7, 2017, Goodman published a video on YouTube entitled, **“Bone Thugs and Disharmony: Conspiracy to Silence Truth?”**. To date, the video has received more than 13,775 views.

29. On November 27, 2017, Goodman published a video on the “Jason Goodman” YouTube channel entitled, **“Deep State Dunces Attack George Webb and CSTT – Bitcoin Challenge Response”**. To date, the video has received more than 15,320 views.

30. On December 27, 2017, Goodman published a video on the “Jason Goodman” YouTube channel entitled, **“Meme Wars – Are Deceptive Operatives Conducting Psychological Warfare in Plain Sight?”**. To date, the video has received more than 18,640 views.

31. On February 13, 2018, Goodman published a video on the “Jason Goodman” YouTube channel entitled, **“Kevin Shipp – CIA Whistleblower”**. To date, the video has received more than 34,770 views.

32. On March 5, 2018, Goodman published a video on YouTube entitled, **“Ole Dammegard & Cody Snodgres – False Flags Pattern Recognition from JFK to Parkland School Shooting”**.

33. On March 15, 2018, Goodman published a video on the “Jason Goodman” YouTube channel entitled, **“Truth vs Lies”**. To date, the video has received more than 34,770 views.

34. Between June 1, 2017 and September 1, 2017, Goodman visited one or both of Plaintiffs’ websites.

**II. Legal and Evidentiary Stipulations**

1. Plaintiffs are citizens of Virginia.

2. Goodman is a citizen of New York.

3. Lutzke is a citizen of Colorado.

4. The United States District Court for the Eastern District of Virginia has subject matter jurisdiction over this action pursuant to 28 U.S.C. § 1332. The parties are citizens of different States and the amount in controversy exceeds the sum or value of \$75,000, exclusive of interest and costs.

5. Venue is proper in the Richmond Division of the United States District Court for the Eastern District of Virginia.

6. The parties have agreed to continue working together up to and during trial to see if the issues may be narrowed and the trial streamlined by way of further stipulation.

DATED: July 9, 2020

/s/ Steven S. Biss

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*Pro Se Defendant*

**CERTIFICATE OF SERVICE**

I hereby certify that on July 10, 2020 a copy of the foregoing was filed electronically using the Court's CM/ECF system, which will send notice of electronic filing to counsel of record and all interested parties receiving notices via CM/ECF, and a copy was emailed in PDF to Defendants, Goodman and Lutzke.

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